Message

From: Fogarty, Johnpc [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8546B387C687410D88EEEE387DADDF56-JFOGAR02]

Sent: 10/13/2016 6:00:26 PM

To: Welles, Laura [Welles.Laura@epa.gov]

Subject: RE: Draft CAFO -- Whole Foods

Got it. Totally agree.

From: Welles, Laura

Sent: Thursday, October 13, 2016 1:56 PM **To:** Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>

Subject: RE: Draft CAFO -- Whole Foods

With regard to "consumer products" definition – R6 did not include a definition or list any of the products in the CAFO. R6 only concluded that in general WF has customer returns and expired products that are SW and at a minimum WF generated HW having the characteristic of ignitability (D001), corrosivity (D002) and toxicity (D007, D010, D009, and D011).

The Walmart CAFO had a "consumer products" definition (products sold in consumer product packaging which are transported as part of the Reverse Distribution Process) and did list some of the products (bleaches, pool chlorine and acids, pesticides, fertilizers, paints and varnishes, lamp oil and other ignitable liquids, aerosol products, oven cleaners and various other cleaning agents, automotive products and solvents, and other flammable and corrosive materials.).

From: Fogarty, Johnpc

Sent: Thursday, October 13, 2016 1:20 PM **To:** Welles, Laura < <u>Welles.Laura@epa.gov</u>> **Subject:** RE: Draft CAFO -- Whole Foods

Thanks – I will look at this asap. Quick reactions to the questions below (in red so they'll stand out) -

From: Welles, Laura

Sent: Thursday, October 13, 2016 11:47 AM **To:** Fogarty, Johnpc@epa.gov>

Subject: Draft CAFO -- Whole Foods

Attached is the draft Whole Foods CAFO – it's a bit rough and in need of a fresh set of eyes.

A couple of things:

Ex. 5 AC/AWP/DP

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Please review, edit, comment, etc.

Laura

Laura Welles Attorney Advisor Waste and Chemical Enforcement Division Office of Civil Enforcement U.S. Environmental Protection Agency (202) 564-2754